

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SHARON PIZARRO and LARRY ZIELINSKI,
individually and on behalf of all others
similarly situated,

Plaintiffs,

- against -

SAZERAC COMPANY INC.,

Defendant.

No. 7:23-cv-02751-KMK

**JOINT MOTION TO DROP
PLAINTIFF LARRY ZIELINSKI AS A
NAMED PLAINTIFF**

Pursuant to Federal Rule of Civil Procedure 21, and subject to the Court’s approval, Plaintiff Sharon Pizarro (“Plaintiff”) and Defendant Sazerac Company Inc. (“Defendant”) (together, the “Parties”) hereby jointly move the Court to drop Larry Zielinski as a named plaintiff and class representative in this matter and to remove his name from the case caption. In support of the motion, the Parties state as follows:

1. Pursuant to Federal Rule of Civil Procedure 21, before trial, “the court may at any time, on just terms, add or drop a party.”

2. As the Parties explained in their May 7, 2025, joint status report to Magistrate Judge Krause (Dkt. 54), Plaintiff Larry Zielinski failed to appear for two depositions scheduled to accommodate his schedule, and disconnected from a third scheduled deposition after only 15 minutes.

3. Despite Plaintiffs’ counsel’s best efforts, Plaintiffs’ counsel has been unable to reach Plaintiff Larry Zielinski since he disconnected from the third scheduled deposition.

4. In light of Plaintiff Larry Zielinski’s apparent unwillingness to be deposed in this matter, the Parties stipulate and agree that he should be dropped as a named plaintiff and class representative in this matter.

Dated: May 21, 2025

Respectfully submitted,

BURSOR & FISHER, P.A.

By: /s/ Neal J. Deckant

Neal J. Deckant
Jenna L. Gavenman
1990 North California Blvd., 9th Floor
Walnut Creek, California 94596
Tel: (925) 300-4455
ndeckant@bursor.com
jgavenman@bursor.com

REESE LLP

Charles D. Moore
121 N. Washington Ave., 2nd Floor
Minneapolis, Minnesota 55401
Tel: (212) 643-0500
cmoore@reesellp.com

REESE LLP

Michael R. Reese
100 West 93rd Street, 16th Floor
New York, New York 10025
Tel: (212) 643-0500
mreese@reesellp.com

SHEEHAN & ASSOCIATES, P.C.

Spencer Sheehan
60 Cuttermill Rd., Suite 412
Great Neck, New York 11021
Tel: (516) 268-7080
spencer@spencersheehan.com

LAUKAITIS LAW LLC

Kevin Laukaitis
Daniel Tomascik (admitted *Pro Hac Vice*)
954 Avenida Ponce De Leon
Suite 205, #10158
San Juan, Puerto Rico 00907
Tel: (215) 789-4462
klaukaitis@laukaitislaw.com

Counsel for Plaintiffs and the Proposed Class

Dated: May 21, 2025

Respectfully submitted,

DORSEY & WHITNEY LLP

By: /s/ Creighton R. Magid

Creighton R. Magid (admitted *Pro Hac Vice*)
1401 New York Avenue NW, Suite 900
Washington, DC 20005
Tel: (202) 422-3555
magid.chip@dorsey.com

DORSEY & WHITNEY LLP

Elizabeth Rozon Baksh
51 West 52nd Street
New York, NY 10019
Tel: (212) 415-9200
baksh.elizabeth@dorsey.com

*Attorneys For Defendant Sazerac
Company, Inc.*